

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

Cr. No. 19-10080-NMG

GREGORY COLBURN, et al.,

Defendants.

**DEFENDANT JOHN WILSON'S SECOND MOTION
TO CHANGE SENTENCING DATE**

Defendant John Wilson moves that the Court advance his sentencing date from February 17, 2022 to February 16, 2022. As grounds for this motion Wilson states:

1. Martha Victoria is the U.S. Probation Officer assigned to Wilson's case. She has a longstanding vacation scheduled for February 17-25, 2022. Wilson understands she has served as the probation officer for all or virtually all of the Varsity Blues cases. She has interviewed Wilson, conducted a home visit to his residence, and conducted numerous other steps that are part of the standard sentencing process. Thus, she has a deep understanding of the relevant issues.
2. Wilson believes the Court and both parties would be best served if Ms. Victoria can attend the hearing. A supervisor or another probation officer "filling in" will not have the same depth of experience with the issues in this case.
3. Wilson also moves that the Court amend, by one day, two dates in the schedule for the preparation of the Pre-Sentence report as follows:
 - a. The parties' objections to the draft Pre-Sentence Report will be due to Probation on January 26, 2022, not January 27, 2022; and

b. The final Pre-Sentence Report will be due to the parties and Court on February 9, 2022, not February 10, 2022.

4. The government has informed Wilson's counsel that it has a trial commitment in early March but is available prior to February 17, 2022.

5. Ms. Victoria has confirmed her availability on February 16, 2022 and is in agreement with the schedule changes.

Dated: January 4, 2022

Respectfully submitted:

By counsel for John Wilson

/s/ Michael Kendall

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

I hereby certify that, before filing this motion, I conferred with the government regarding dates for the sentencing prior to February 17, 2022 and subsequently copied the government on the email discussion of these changes and the government did not indicate any objection to these new dates.

/s/ Michael Kendall
Michael Kendall

CERTIFICATE OF SERVICE

This document is being filed on the date appearing in the header through the ECF system, which will provide electronic copies to counsel of record.

/s/ Michael Kendall
Michael Kendall